



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105**

Certified Mail:  
Return Receipt Requested

September 18, 2015

Mr. Paul K. Ohlmann  
Vice President, IDS Real Estate Group  
Site Owner Representative (GIL)  
On Atlantic LLC  
515 South Figueroa Street, 16th Floor  
Los Angeles, CA 90071

**SUBJECT**

Access to: General Inspection Laboratories Site  
CERCLIS EPA ID: CAD027897164  
Los Angeles County Assessor Parcel Number(s): 6224-036-005

Investigation Activities: Subsurface Soil and Groundwater Sampling

Dear Mr. Ohlmann,

The U.S. Environmental Protection Agency (EPA) is conducting a Site Inspection (SI) at the subject site, General Inspection Laboratories (GENIL), pursuant to its response and enforcement responsibilities under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. §9601 et seq. EPA requests that you sign the attached Access Agreement authorizing EPA to conduct the investigation activities, identified above, on your property.

The GENIL site was brought to the attention of EPA by the California Department of Toxic Substances Control (DTSC) as part of a joint effort in identifying potential sources of volatile organic compounds (VOC) and metals contamination in ground water in the vicinity of the "710 Corridor" area. The Preliminary Assessment (PA) Report for the site, which was completed by

EPA in April 2015, finds that there is evidence to indicate that a release of hazardous substances, primarily VOCs and metals, to groundwater may have occurred from one or more sources on the GENIL site based on the historic use and storage of hazardous substance at the site. Analytical data taken at the site and the immediate area also substantiates this concern. Some of substances found on-site have also been found in adjacent public drinking water wells. The shallow groundwater flow direction at the site has not been adequately determined. The regional groundwater flow direction within the deeper aquifers in the vicinity of the site generally trends towards the southwest with temporal fluctuations from west to south-southwest. The nearest impacted drinking water well, which was closed in 2002 due to VOC and metals contamination, was located approximately 0.25 mile southeast of the site. There are another 167 drinking water wells within 4 miles of the site that include one non-impacted well, which is 0.22 mile to the north-northwest, and another impacted well that is 0.41 mile to the east-northeast, which was closed in 2000 due to metals contamination. Many of the remaining drinking water wells in the 4 mile radius are hydrologically downgradient from the site and could potentially be impacted by aquifer contamination from the site.

Based on the information presented in the April 2015 PA Report, EPA has determined that the GENIL site has the potential to qualify for the National Priorities List (NPL). However, in order to substantiate if a release of these substances to area groundwater has occurred, EPA will need to conduct a Site Investigation (SI), which will include sampling of soil and groundwater both on, and adjacent to, the site.

Weston Solutions, Inc. (WESTON), is EPA's contractor who will be performing the SI sampling under EPA's direction. WESTON will be responsible for the overall coordination of the investigation and for ensuring the execution of the project within the anticipated schedule and in accordance with reasonable requirements made by property owners or designees.

The SI Sampling investigation will include the advancement of up to eleven (11) direct push borings to approximately 60 feet bgs and six (6) additional cone penetration testing (CPT) borings to approximately 150 feet bgs. In addition, seven (7) existing on-site groundwater monitoring wells will be sampled during the investigation. Eighteen (18) of the 24 locations will be located on the parcel(s) occupied by the former and current General Inspection Laboratories facilities. A figure illustrating the proposed sample locations is enclosed (Attachment A). Soil matrix samples will be collected from four (4) distinct depths at all eleven (11) of the direct push locations. Shallow groundwater samples will be collected from two (2) distinct depths at two (2) of the eleven (11) direct push locations as well as all seven (7) of the existing on-site monitoring wells. Shallow and deeper groundwater samples will be collected from three (3) distinct depths at all six (6) of the CPT locations. These sample location totals include the entirety of the investigation and include those parcel(s) identified in the subject line as well as one (1) additional parcel(s).

Once completed, the final Sampling and Analysis Plan (SAP) for the investigation will be provided to you in a digital format, which is anticipated to occur by Friday, September 25<sup>th</sup>, 2015. In addition, a hardcopy of the SAP can be mailed to you upon your request. It should be noted that the SAP is final and is subject to your review, but not your approval. EPA will, of course, consider any clarifying questions or comments you may have on the SAP, but we will not consider those binding.

The owner and/or operator of the subject site may request that 'split-samples' be provided for each sample collected during the investigation. EPA will make a reasonable effort to grant this request if such request does not adversely impact the integrity of the investigation or the overall schedule of work. EPA will not provide sample containers for the 'split-samples' nor can EPA guarantee that sufficient sample volume will be collected for multiple sets of samples, in which case EPA sample volumes will be prioritized. In addition, if actual field conditions require a modification in the tentative schedule, EPA will make a reasonable effort to notify the owner and/or operator representative(s) of the change; however, EPA cannot guarantee that sufficient notification will be provided to allow for the representative to remobilize to the site.

Approximately two weeks prior to the advancement of the borings, a geophysical survey will be conducted to identify any underground utilities, tanks, or other obstacles that may exist on or near all sampling locations at the site. In addition, Underground Service Alert of Southern California (i.e., DigAlert) will be notified at least 72 hours before drilling commences.

During the sampling event, industrial derived waste (IDW) may be accumulated. Up to one (1) 55-gallon drum of soil cuttings and one (1) 55-gallon drum of purge groundwater/decontamination fluids will be required to be left on the subject site at a location deemed suitable by the site owner or operator, pending laboratory analysis. Appropriate IDW disposal arrangements will be coordinated by WESTON subsequent to the reception of analytical findings at no costs to the site owner or operator.

EPA requests access to the subject site for the following times and purposes:

- 1) Period: Monday, October 12<sup>th</sup> through Friday, October 16<sup>th</sup>, 2015  
Purpose: Geophysical survey

It is anticipated that the geophysical survey will require approximately eight (8) hours on the subject site, which is tentatively scheduled for Tuesday, October 13<sup>th</sup> and Wednesday, October 14<sup>th</sup>. However, to account for fieldwork uncertainties, EPA requests access to the subject site for the entirety of the period stated above. No sampling will be conducted during this time period. In addition to EPA and any representatives of California state or local environmental regulatory agencies, the following firms will require access to the site during this time period:

WESTON  
ULS Services Corporation

- 2) Period: Monday, November 2<sup>nd</sup> through Friday, November 20<sup>th</sup>, 2015  
Purpose: SI soil and groundwater sampling – direct push

It is anticipated that the investigation will require approximately three (3) days to complete and is tentatively scheduled for Monday, November 9<sup>th</sup> through Wednesday, November 11<sup>th</sup>, 2015. However, to account for fieldwork uncertainties, EPA requests access to the subject site for the entirety of the period stated above. The samples will be collected by an

EPA contractor who will be utilizing a direct push drilling rig and a CPT drilling rig. Each drilling rig will be accompanied by two EPA contractors and a 2-man drilling crew. In addition to EPA and any representatives of California state or local environmental regulatory agencies, the following firms will require access to the site during this time period:

WESTON  
Gregg Drilling & Testing, Inc.

- 3) Period: Monday, November 2<sup>nd</sup> through Friday, November 20<sup>th</sup>, 2015  
Purpose: SI groundwater sampling and surveying – existing wells.

It is anticipated that the sampling and surveying of the existing on-site monitoring wells will require approximately two (2) non-consecutive days; a specific schedule to complete this effort has not yet been developed. The samples will be collected by an EPA contractor who will be utilizing a Hydrasleeve sampling device, which will need to be installed between 2 and 14 days prior to sampling. The monitoring well survey will be conducted by a WESTON subcontractor. In addition to EPA and any representatives of California state or local environmental regulatory agencies, the following firms will require access to the site during this time period:

WESTON  
Land Survey Firm (TBD)

An Access Agreement providing permission for EPA and its contractors to access your property is included as Attachment B and is accompanied by an addressed, stamped envelope for returning the signed agreement to EPA. Please return your signed Access Agreement to me by Friday, October 7<sup>th</sup>, 2015.

Upon signing the Access Agreement, please coordinate with the WESTON Field Project Manager, Brian Reilly, at (541) 593-3800 (office) or (541) 771-4397 (mobile) to discuss logistics.

Please be aware that EPA has the right to access private property pursuant Section 104(e)(4)(A) of CERCLA, 42 U.S.C. §9601 et seq. This section states that “any officer, employee, or representative is authorized to inspect and obtain samples from any vessel, facility, establishment, or other place or property or from any location of any suspected hazardous substance or pollutant or contaminant.” If EPA cannot arrange for voluntary access, EPA is authorized to issue an administrative order for access, under which failure to comply is subject to civil penalties of up to \$27,500/day.

In summary:

1. The geophysical survey sampling activity is tentatively scheduled for October 13-14, 2015; the direct push sampling activity is tentatively scheduled for November 9-11, 2015; and the existing well sampling and surveying will occur between November 2 and 20, 2015.

2. Access to the subject site is requested for the periods of October 12-16, 2015 (geophysical survey) and November 2-20, 2015 (sampling effort & staging area request).
3. Return your signed Access Agreement (Attachment B) to EPA in the stamped, addressed envelope by October 7, 2015.
4. Upon signing the Access Agreement, coordinate with Brian Reilly of WESTON to discuss investigation logistics.

EPA appreciates your cooperation in promptly returning your signed Access Agreement to EPA by October 7<sup>th</sup>, 2015. If you have any questions regarding the project, you can reach me at (415) 972-3096 or the EPA Attorney, Andrew Helmlinger, (415) 972-3904.

Sincerely,



Matt Mitguard, Site Assessment Manager  
United States Environmental Protection Agency  
Superfund Division

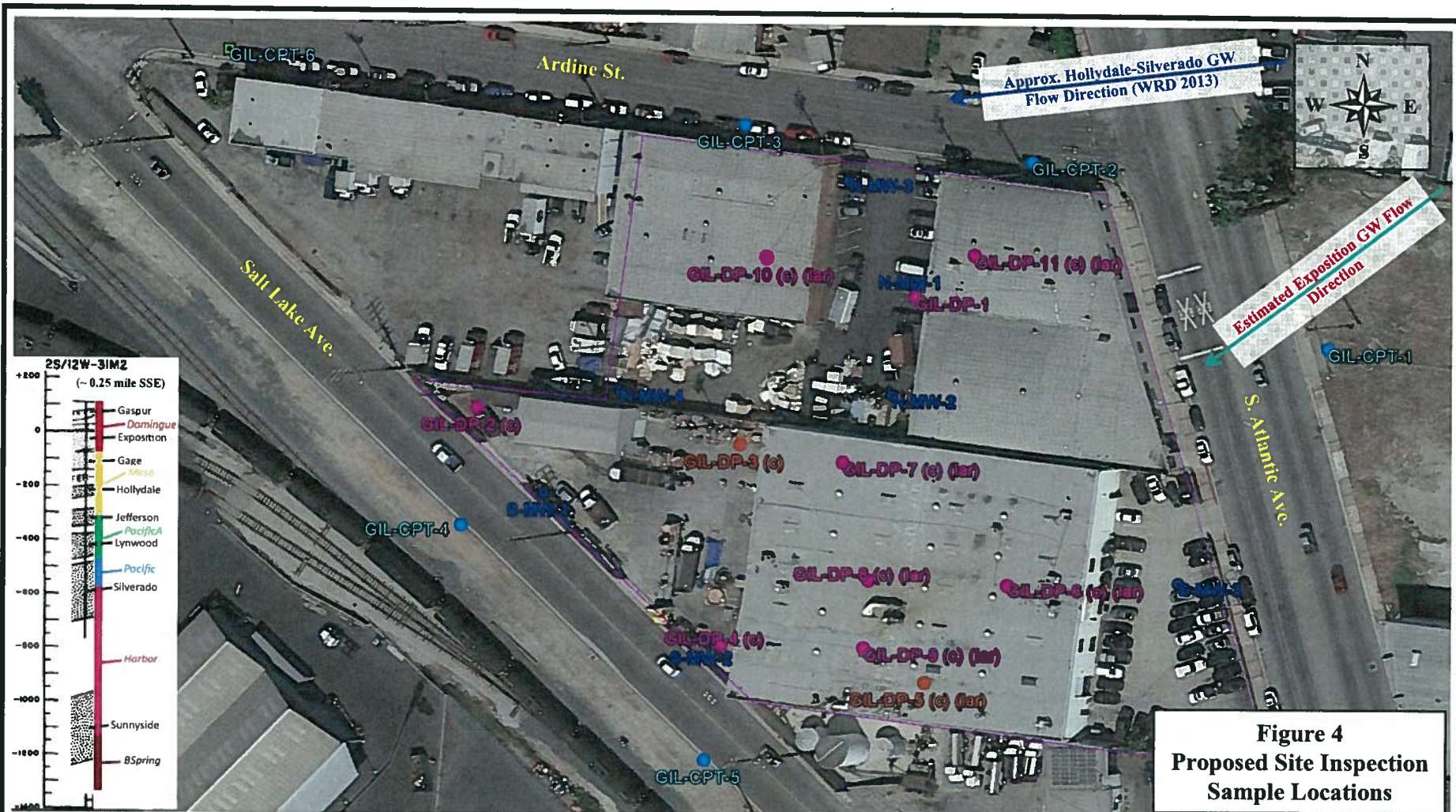
Encl:

Attachment A: SI Sample Locations

Attachment B: Access Agreement and stamped envelope

cc: Joe DeFao, Weston Solutions, Inc.  
Javier Hinojosa, CA Department of Toxic Substances Control  
Patrick Movlay, CA Department of Toxic Substances Control  
Andrew Helmlinger, USEPA





- **Proposed Combined Direct Push Soil/Groundwater Grab Sample Location**  
 [Two discrete-depth Groundwater (~ 35 & 60 ft-bgs) and Soil Matrix (2, 5, 10, & 15 ft-bgs)]  
 (2 Locations = GIL-DP-3 & GIL-DP-5)
- **Proposed Direct Push Soil Sample Location [Soil Matrix only (2, 5, 10, & 15 ft-bgs)]**  
 (9 Locations = GIL-DP-1, 2, 4, 6, 7, 8, 9, 10, & 11)
- **Proposed Groundwater Grab Sample Location (~ 60, 90, & 130 ft-bgs)**  
 (5 Locations = GIL-CPT-1 through GIL-CPT-5)
- **Proposed Combined CPT/Background Soil Location Groundwater Grab Sample Location [Three discrete-depth Groundwater (~ 60, 90, & 130 ft-bgs) and Soil Matrix (2, 5, 10, & 15 ft-bgs)]**  
 (1 Location = GIL-CPT-6)
- **Existing Monitoring Well - Groundwater Grab Sample Location (~ 60 ft-bgs)**  
 (7 Locations = S-MW-1 through S-MW-3 & N-MW-1 through N-MW-4)

Total Samples (not including QC): 29 groundwater samples  
 48 soil matrix samples

**General Inspection Laboratories, Inc.**  
 8427 Atlantic Avenue  
 Cudahy, CA

All Soil and GW Samples to be analyzed for VOCs and Metals

Draft Revision Date: September 10<sup>th</sup>, 2015. Disregard all undated and previous dated draft versions.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105**

**ACCESS AGREEMENT**

**Subject: Access to On Atlantic LLC Property  
Assessor Parcel Number(s): 6224-036-005  
EPA Site Name: General Inspection Laboratories  
EPA ID Number: CAD027897164**

I consent to officers, employees, contractors, and authorized representatives of the United States Environmental Protection Agency (EPA) entering and having continued access to this property for the following purposes and time periods:

1. Geophysical Survey – October 12<sup>th</sup> through 16<sup>th</sup>, 2015.
2. Site Inspection Soil and Groundwater Sampling, and Monitoring Well Surveying – November 2<sup>nd</sup> through November 20<sup>th</sup>, 2015.

I realize that these actions taken by EPA are undertaken pursuant to its response and enforcement responsibilities under the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. §9601 et seq.

This written permission is given by me voluntarily, on behalf of myself and all other co-owners of this property, with knowledge of my right to refuse and without threats or promises of any kind.

\_\_\_\_\_  
**Date**

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Print name, title**

Note: Please return this agreement using the self-addressed and franked envelope provided